

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE**

Laurie Ortolano,

Plaintiff,

v.

The City of Nashua, New Hampshire, et al.,
Defendants.

No. 22-cv-00326-LM

**DEFENDANTS INCEPTION TECHNOLOGIES, INC. AND RAYMOND FEOLI'S
ANSWER TO PLAINTIFF'S VERIFIED COMPLAINT**

Defendants Inception Technologies, Inc. and Raymond Feoli (collectively, "Defendants")
hereby answer Plaintiff Laurie Ortolano's ("Plaintiff") Verified Complaint as follows:

I. Preliminary Statement

To the extent a response is required, denied.

II. Parties

1. Defendants are without knowledge or information sufficient to form a belief as to
the truth of the allegations in this paragraph.

2. Defendants are without knowledge or information sufficient to form a belief as to
the truth of the allegations in this paragraph.

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the truth of the allegations in this paragraph.

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the truth of the allegations in this paragraph.

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9. Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph.

10. Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph.

11. Defendants deny that Inception provides document hosting services. Otherwise admitted.

12. Admitted.

III. Jurisdiction and Venue

13. The allegations in this paragraph constitute legal conclusions to which no response is required. To the extent a response is required, denied.

14. The allegations in this paragraph constitute legal conclusions to which no response is required. To the extent a response is required, denied.

IV. Facts Common to All Counts

15. Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph.

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121. Denied.

122. Denied.

123. Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph.

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V. Causes of Action

Counts One, Two, Three, Four, Five, Six, Seven, and Nine are not asserted against Defendants. Therefore, no response is required as to those Counts. To the extent a response is required, denied. Count Ten was dismissed as to Defendants. Therefore, no response is required as to Count Ten.

Count Eight (Defamation)

181. Denied.

182. Admitted.

183. Admitted.

184. Denied.

185. Denied.

186. Denied.

187. Denied.

188. Denied.

189. Denied.

V. Demand for Relief

Defendants deny that Plaintiff is entitled to a judgment and/or any relief requested in her Demand for Relief.

VI. Jury Demand

Defendants respectfully demand a trial on all issues so triable.

AFFIRMATIVE DEFENSES

Without admitting or acknowledging that Defendants bear any burden of proof as to any of them, Defendants assert the following affirmative and other defenses. Defendants incorporate the facts and allegations in their Answer into each of their affirmative and other defenses. Defendants hereby reserve the right to add defenses, or amend or modify the existing defenses, and hereby give notice that they intend to rely upon such other and further defenses as may become available or apparent during discovery and pretrial proceedings in this case.

FIRST DEFENSE

Plaintiff fails to state a claim upon which relief can be granted.

SECOND DEFENSE

Plaintiff's claims are barred by the doctrine of unclean hands.

THIRD DEFENSE

Plaintiff's claims are barred, because Plaintiff has not suffered any injury or damage.

FOURTH DEFENSE

To the extent Plaintiff has suffered any injury, it was caused by Plaintiff or a third party or parties for whom Defendants had no responsibility.

WHEREFORE, Defendants pray that Plaintiff's Verified Complaint be dismissed, and that Defendants be awarded costs, attorney's fees and such other relief as this Court deems just and proper.

Respectfully submitted,
Dated: June 11, 2024

Defendants Inception Technologies, Inc.
and Raymond Feoli,
By their attorneys,

/s/ Brian T. Corrigan
Brian T. Corrigan (*pro hac vice*)
122 Chestnut Street
Andover, MA 01810
(978) 988-1544
CorriganLaw@gmail.com

Emmanuel Gonzalez (Bar No. 275359)
Gonzalez Legal, PC
PO Box 221
Lynn, MA 01903
e@gonzalezlegaloffice.com
T. (781) 346-4874
F. (781) 318-5999

CERTIFICATE OF SERVICE

I certify that a copy of this filing was served via the Court's ECF filing system upon counsel of record.

Dated: June 11, 2024

/s/ Brian T. Corrigan
Brian T. Corrigan